

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

May 15, 2022

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Willie Dennis  
20 Cr. 623 (LGS)**

Dear Judge Schofield,

We write on behalf of Willie Dennis in the above-captioned matter. As the Court knows, on April 25, 2022, Mr. Dennis renewed his request to remove the home detention and location monitoring conditions of his pretrial release. That request is currently pending before the Court.

We write to raise a separate, but related, request. On May 22, 2022, Mr. Dennis's youngest son will be graduating from college in upstate New York. While the conditions of Mr. Dennis's pretrial release currently do not permit travel to the Northern District of New York, the government and Pretrial Services both consent to Mr. Dennis traveling to and attending this event (with the coordination of Pretrial Services in Florida). We respectfully request that the Court permit Mr. Dennis to briefly travel to the Northern District of New York for this occasion.<sup>1</sup>

We recognize the Court's ongoing obligations overseeing a lengthy civil trial and stand ready to provide any additional information the Court may need to address this time-sensitive request.

---

<sup>1</sup> Mr. Dennis remains hopeful that he may attend his son's college graduation without conspicuously large location monitoring equipment, which may activate and make noise at any time, potentially ruining his son's graduation ceremony and causing him significant shame and embarrassment.

United States v. Dennis  
20 Cr. 623 (LGS)

Respectfully submitted,

/s/ Neil Kelly

Neil P. Kelly  
Assistant Federal Defender  
(212) 417-8744

Jennifer L. Brown  
Attorney-in-Charge  
(212) 417-8700

cc: AUSA Sarah Kushner  
Pretrial Services Officer Joshua Rothman